

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KATHERINE YOST, :  
: Plaintiff, :  
: :  
: Case No. 1:22-cv-06549(PAE)(SLC)  
: :  
: DECLARATION OF  
: JANINE YORIO  
EVERYREALM INC., COMPOUND ASSET :  
MANAGEMENT LLC, REALM METAVERSE :  
REAL ESTATE INC., REPUBLIC, REPUBLIC :  
CRYPTO LLC, REPUBLIC REALM MANAGER :  
LLC, REPUBLIC REALM INC., REPUBLIC :  
OPERATIONS LLC, OPENDEAL INC., :  
OPENDEAL PORTAL LLC, JANINE YORIO in :  
her individual and professional capacities, :  
WILLIAM KERR in his individual and :  
professional capacities, and ZACH HUNGATE in :  
his individual and professional capacities.  
: Defendants.  
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Janine Yorio, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I currently serve as the Chief Executive Officer of Everyrealm Inc., and am a resident of the State of New York. I submit this Declaration based upon my personal knowledge and in support of the Motion to Dismiss Plaintiff's Claim for Sexual Harassment on behalf of Everyrealm Inc. ("Everyrealm"), William Kerr ("Mr. Kerr"), Zach Hungate, and myself (collectively "the Everyrealm Defendants") in the above-captioned matter.

2. On June 16, 2022, Plaintiff Katherine Yost wrote me an upward review, stating: "You continue to astound me with your tremendous resilience and desire to keep getting better. I

am truly humbled to be a part of your journey. Thank you for reminding me of my own blindspots in comparing male/female executive relationships and the double standards even I still carry. Having you as a mirror in that respect is so valuable and helps me grow and I appreciate the way we've adopted (always maintained?) this authentic relationship. Letting me show up as I am - it means a lot."

3. A true and correct copy of the June 16 Upward Review is attached hereto as Exhibit A.

4. On June 2, 2022, in response to Plaintiff Teyo Johnson publicizing to Everyrealm employees that a woman he was seeing would not engage with him in sexual relations, Katherine Yost sent me a text message stating: "Look at you blaming yourself for Teyo[‘s] misogyny like you encouraged [it]. All you did was engage about a friend he introduced. We've been gaslit to believe we bring this all on. And it's horseshit."

5. A true and correct copy of Katherine Yost’s text message is attached hereto as Exhibit B.

6. Also on June 2, Katherine Yost and I discussed Teyo Johnson’s inappropriate commentary via Everyrealm’s Slack Instant Messenger.

7. In the messages, Yost wrote, “[Johnson] is a misogynist that’s evident.”

8. I responded by stating, “when [Johnson] told everybody in the office (with disgust) that the girl who he was crashing with had her period (insinuating that he couldn’t sleep with her as a result) that really put me off . . . that’s across the line . . .”

9. Yost replied, “I would have walked him out into the hall and slammed him . . . I don’t care how big anyone is.”

10. I then stated, “maybe I started it . . . I was calling [Johnson’s date] ‘dog in a bag.’”

11. Yost then stated, “[j]oking about a dog in a purse is not asking for sexual updates . . . It’s gross and most people (humans) know not to do this . . .”

12. A true and correct copy of the above-described conversation is attached hereto as Exhibit C.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: 11 / 02 / 2022

  
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Janine Yorio